1. A wellbore completion tool assembly, comprising:

a perforated body made of an expandable material said perforations are non-slotted;

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a stretchable filter assembly secured to said perforated body so as to cover the perforations in said body;

a tool acting on said body to expand it and said filter mounted around it without sliding movement of one portion of said filter over another portion of said filter to allow said filter to move toward the surface defining the wellbore.

13 14. A method of well completion, comprising:

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running in a tubular body with non-slotted perforations and a stretchable filter assembly secured to said body;

expanding the tubular body and the stretchable filter downhole without sliding movement of one portion of said filter with respect to another.

REMARKS

Applicants have carefully reviewed the Office Action mailed November 2, 2000.

With regard to the priority claim, it is noted the application transmittal papers, paragraph 9, called for amendment of the specification by adding a sentence regarding the reliance on the provisional Application. However, in view of the Examiner's request, the specification has been amended to specifically request again the inclusion of a statement regarding the reliance on the previous provisional application.

The registered mark symbol has been placed next to the word Viton which is already capitalized in the specification. Viton is generically referred to as an elastomeric material on page

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6, line 22 of the specification. The specific product number for the material is stated on page 4, line 22 of the specification.

The abstract has been amended to take out the word "easily".

Figure 3 has been redrawn informally to show the Examiner the placement of the various layers referred to in this specification. There is apparently some confusion on the part of the Examiner which applicants would like to rectify. Figure 2 indeed shows the grid 26 between the tube 20 and the filter material 28. The tube 20 is made from a segment 12 which has perforations 14 as shown in figure 4. As stated in the specifications page 4, line 18, the purpose of the grid is to provide support off the tube for the open cell filter media 28. In order to do this the grid is positioned between the tube and the filter media. Since the filter media would normally span the openings 14, the grid 26 provides additional structural strength particularly in the areas of the openings 14. It is now believed that the correction of the drawings particularly the submission of a revised figure 3, which includes no new matter and tracks the language of the specification, now clears up the component assembly for the Examiner. Because of the above clarifications, it is respectfully submitted that the distinctiveness rejections in paragraph 8 of the Office Action have now been overcome. Again, the grid is not outside the filter media in figure 2. The grid 26 is between the filter media 28 and the tube 20 and in that position it acts as a reinforcement against collapse of the filter 28 in the area of the openings 14.

The Examiner has rejected claims 1 and 14 as being anticipated by Donnelly. The Donnelly design features segmented filter layers shown in figures 1 and 2 which ride over each other as the assembly is expanded. Donnelly teaches overlapping filter segments wherein the overlap between adjacent filter sheets is reduced upon circumferential expansion. Apart from the design using

discreet overlapping sheets, a single scroll is taught which again features an overlapping segment to accommodate expansion. Claims 1 and 14 have been amended to indicate that the expansion of the stretchable filter material occurs without sliding movement of one portion of the filter with respect to another. This overcomes a shortcoming of the design disclosed to be expandable in Donnelly. Additionally, the perforated or tubular body in claims 1 and 14, respectively, has non-slotted openings. Slotted openings severely weaken the pipe in order to allow it to be easily expanded. The slotted openings turn to diamond shapes on expansion. The bending that occurs during expansion can engage the filter segments and the result is tearing despite the sliding movement of one filter layer relative to another. The base pipe with slots will tear the filter segments in Donnelly on expansion. Claims 1 and 14 by getting away from the slotted tube design, eliminate this tearing problem. In the preferred design covered by claims 1 and 14, the openings can be round, as described in the specification page 8, line 14.

With regard to claim 2, the Examiner now combines Donnelly with Arterbury. Arterbury does not disclose a protective cover. Donnelly discloses a perforated outer cover 5. Donnelly and Arterbury teach away from each other in several respects. Arterbury is merely a sheet applied over the base pipe to temporarily cover the perforations in the base pipe until they are attacked internally by acid circulated inside the pipe. Claim 2 requires a protective cover for the filter assembly which is removable down hole. As a first matter, the combination of Arterbury and Donnelly even if it were possible would not yield a protective cover for the filter assembly since Arterbury teaches the use of a dissolvable layer mounted over the base pipe and not mounted over the filter assembly. Furthermore, Donnelly already teaches the use of a perforated outer cover which is not removable. Thus a combination with Arterbury is not suggested by Donnelly. These references teach away from

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each other in two respects. First, the non-removable cover of Donnelly has perforations. This teaches away from a barrier layer suggested by Arterbury. Secondly, the perforated outer cover of Donnelly is outside the filter material to protect it from damage during run in. Arterbury's layer which can be removed chemically is within the filter material and can serve no function of protecting the filter material during run in. It is respectfully submitted that claim 2, as currently presented, is novel and unobvious even if it were permissible to combine Donnelly with Arterbury.

As to claims 5 and 18 there is no discrete support structure apart from the filter structure in Donnelly.

In view of the above amendments to the claims and the redone figure 3 as well as the other amendments to the specification, it is now respectfully submitted that the entire case is in condition for allowance. Applicants will formally apply to the official draftsman to make the requisite changes. Figure 3 is being submitted informally at this time for the Examiner's consideration. The formal drawings will be tendered at such time when the entire case is in condition for allowance. Allowance of the case is requested.

Respectfully submitted,

Date: December 8, 2000

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I hereby certify that this correspondence along with any referred to as attached or enclosed is being deposited with the United States Postal Service as First Class Mail, postage prepaid, in an envelope addressed to: Commissioner for Patents, Washington, D.C. 20231, on December 8, 2000.

Susan P. Lee

1.   (twice amended).   A wellbore completion tool assembly, comprising:

a perforated body made of an expandable material <u>said perforations are non-slotted</u>;

a stretchable filter assembly secured to said perforated body so as to cover the perforations in said body;

a tool acting on said body to expand it and said filter mounted around it <u>without sliding movement of one portion of said filter over another portion of said filter</u> to allow said filter to move toward the surface defining the wellbore.

14.   (twice amended)   A method of well completion, comprising:

running in a tubular body with <u>non-slotted</u> perforations and a stretchable filter assembly secured to [the perforations on the] <u>said</u> body;

expanding the tubular body <u>and the stretchable filter</u> downhole <u>without sliding movement of one portion of said filter with respect to another</u>.
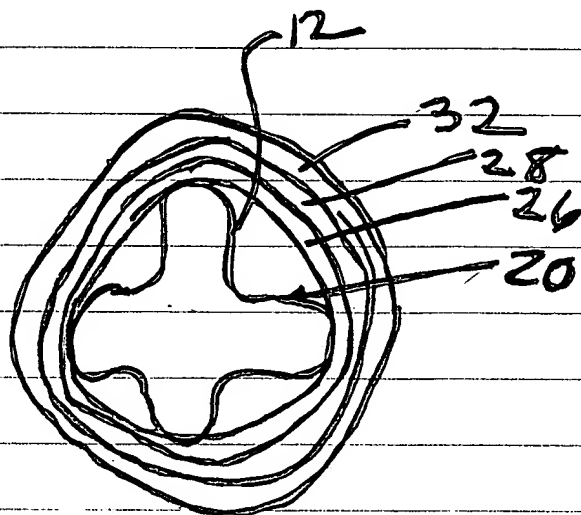
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Correction
Approved
1/3/01 79¢

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FIG # 3